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Dr. Stokes,

I urge you and the National Institute of Environmental Health Sciences (NIEHS) to begin efforts to **completely** replace lethal dose testing with non-animal, in vitro testing methods. Lethal dose testing that uses animals is outdated and being phased out internationally.

Both the *National Society for Medical Research* and the *Office of Technology Assessment* have stated that the LD50 test is "without scientific justification."

According to renowned toxicologist Dr. Gerhard Zbinden, "...the LD50 value determined in animals rarely bears any meaningful relation with the lethal dose in man."

Many manufactures find non-animal tests satisfactory for evaluating the safety of products but are reluctant to use them without Federal encouragement. Non-animal tests, over the long term, will produce better data, lower costs, and reduce time for both industry and regulatory agencies.

By ending LD50 testing, the U.S. will promote more accurate lethal testing results, eliminate needless waste and suffering and promote better health.

Thank you,

Deniz Marie